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2. RNJ is the permittee of Station W33AQ, Palmerton, Pennsylvania. It expects shortly to receive a construction permit for an LPTV station in northern New Jersey. Through its planning for station construction and operation RNJ has discerned some of the competitive disadvantages under which LPTV stations operate in the video marketplace. These disadvantages can be lessened through CBA's proposed solutions, including the introduction of normal four and six-letter television call signs, increased power for qualifying "community" stations, and the treatment of qualifying stations as "television" stations for general regulatory purposes.

3. By fine tuning its regulatory regime for LPTV stations, the Commission would assist the industry in its efforts to achieve the goals established by the Commission when it created the LPTV service.

Accordingly, RNJ requests that the Commission issue a Notice of Proposed Rule Making consistent with CBA's petition and secure public comments on the rule changes proposed therein.

Respectfully submitted,

RADIO NEW JERSEY

By:

  
Lawrence Roberts

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Its Counsel

September 10, 1991

**CERTIFICATE OF SERVICE**

I, Veronica Abarre, a secretary in the law firm of Mullin, Rhyne, Emmons and Topel, P.C., do hereby certify that on this 10th day of September, 1991, a copy of the foregoing "Comments In Support Of Petition For Rulemaking" was sent by first class mail, postage prepaid, to the following:

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Veronica Abarre